

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

NOKIA CORPORATION and NOKIA INC.,

Plaintiffs,

v.

INTERDIGITAL COMMUNICATIONS  
CORPORATION and INTERDIGITAL  
TECHNOLOGY CORPORATION,

Defendants.

C.A. No. 05-16-JJF

**PLAINTIFFS' MOTION FOR LEAVE TO AMEND THEIR COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a), plaintiffs Nokia Corporation and Nokia Inc. (collectively “Nokia”) hereby move for leave to file a First Amended Complaint. Nokia seeks leave to amend its Complaint (which currently asserts a Lanham Act claim) to plead the Lanham Act claim with more particularity, and to add claims for (i) violation of the Delaware Deceptive Trade Practices Act; (ii) common law unfair competition; (iii) intentional interference with prospective business opportunities; (iv) injurious falsehood; (v) commercial disparagement; and (vi) unjust enrichment. The grounds for this motion are set forth in Plaintiffs’ Opening Brief In Support of Motion for Leave To Amend Complaint, filed herewith.

Pursuant to D. Del. LR 15.1, attached hereto are two copies of Nokia’s proposed Amended Complaint (Exhibit 1) and a copy of the Amended Complaint indicating the respects in which it differs from Nokia’s original Complaint (Exhibit 2).

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Julia Heaney*

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January 9, 2007

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D. DEL. LOCAL RULE 7.1.1 CERTIFICATION

I hereby certify that counsel for plaintiffs left voicemail messages with counsel for defendants on December 29, 2006 to advise them of this motion and to seek to confer about the subject matter of this motion, but counsel for defendants did not return the calls.

*/s/ Julia Heaney*

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Julia Heaney (#3052)

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**[PROPOSED] ORDER GRANTING PLAINTIFFS’  
MOTION FOR LEAVE TO AMEND THEIR COMPLAINT**

Whereas, Plaintiffs Nokia Corporation and Nokia Inc. (collectively “Nokia”) have moved for leave to amend the Complaint, and the Court having considered the motion and all papers, argument and other matter submitted in support of and in opposition of the motion,

IT IS HEREBY ORDERED THAT:

1. Plaintiffs’ Motion for Leave to Amend Their Complaint is hereby GRANTED. Plaintiffs’ First Amended Complaint shall be deemed filed as of the date of this Order.

2. Defendants shall file an answer to the amended complaint within 10 days of this order.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Court Judge

CERTIFICATE OF SERVICE

I, Julia Heaney, hereby certify that on January 9, 2007 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Richard L. Horwitz  
Potter Anderson & Corroon LLP

I also certify that copies were caused to be served on January 9, 2007 upon the following in the manner indicated:

BY HAND AND E-MAIL

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*/s/ Julia Heaney*

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